

October 27, 2017

To: Rajinder Sahota,
Climate Change Program
California Air Resources Board, 1001 I Street, Sacramento, California 95814

Online Submission:

https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ctoct122017wkshp-ws&comm_period=1

**COMMENTS ON THE OCTOBER 12, 2017 WORKSHOP ON NEXT STEPS
FOR THE POST-2020 CAP-AND-TRADE REGULATION**

On behalf of our clients, True Manufacturing Co., Inc. and Foam Supplies Inc., we urge the Air Resources Board to adopt the Foam Blowing Agent Methodology ("FBA") to be a compliance offset methodology.

AB 398 continues prior state policy and directs ARB to incentive early reductions and those which go beyond business as usual. The FBA method, which received the 2017 Innovation Award by the American Carbon Registry, incentivizes manufacturers to use low-GWP blowing agents in the manufacture of various polyurethane foams instead of high-GWP blowing agents such as HFCs. Using low GWP blowing agents not only reduces the GHG emissions during manufacture, such also avoids the off-gassing of HFCs which is known to continue throughout the life of the HFC-made foam, including end of life losses. Adopting the FBA method further supports the Short-Lived Climate Pollutant policy and objectives of S.B.1383. Many foam manufacturing plants in California's urban areas could take advantage of this methodology; the FBA also incentives the use of low-GWP foam insulation in buildings instead of using HFC - foam.

We look forward to participating in the upcoming rulemakings in support of the adoption of the FBA as a compliance offset methodology.

Respectfully submitted,



Dentons US LLP

cc: Katie Sullivan
Jon Constantino